## REMARKS

Claims 1, 3-27, and 29-34 are currently pending in the subject application and are presently under consideration. Claims 1, 3-9, 12, 16-21, 24, 27, and 29 have been amended herein as shown at pages 2-6 to correct minor informalities. Favorable reconsideration of the subject patent application is respectfully requested in view of the comments and amendments herein.

### I. Rejection of Claims 1, 3-10, 13-22, 25-27, and 29-34 Under 35 U.S.C. §103(a)

Claims 1, 3-10, 13-22, 25-27, and 29-34 stand rejected under 35 U.S.C. §103(a) as being as being unpatentable over Beyda *et al.* (U.S. 6,148,294) in view of Basso *et al.* (U.S. 6,370,119B1). It is respectfully submitted that this rejection should be withdrawn for at least the following reasons. Beyda *et al.* and Basso *et al.*, alone or in combination, do not teach or suggest all the limitations of the subject claims.

> To reject claims in an application under §103, an examiner must establish a *prima facie* case of obviousness. A *prima facie* case of obviousness is established by a showing of three basic criteria. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. *See* MPEP §706.02(j). The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art and not based on applicant's disclosure. *See In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991).

The subject invention relates to systems and methods that enable intelligent display and access of likely candidate subdirectories during file save, access, browse, and/or other directory operations. (*See* pg. 3, ll. 15-17). In particular, independent claim 1 (and similarly independent claims 13, 26 and 27) recites a first component that ***infers and/or determines expected navigation costs for directory operations associated with potential target directories***, the expected navigation cost is based on a probabilistic

and/or utility analysis; and a second component that outputs a subset of the potential target directories, the ***subset is determined by selecting target directories, based in part on the expected navigation cost, in order to minimize a cost of traversing directories.*** Beyda *et al.* and Basso *et al.*, alone or in combination, do not teach or suggest such claimed aspects.

Beyda *et al.* does not teach or suggest a first component that infers and/or determines expected navigation costs for directory operations associated with potential target directories, the expected navigation cost is based on a probabilistic and/or utility analysis as recited in independent claim 1 (and similarly independent claim 27), which is noted in the Office Action dated March 15, 2005. (*See* pg. 3). Rather, Beyda *et al.* discloses a hierarchical file directory system that analyzes a user's pattern of access and use *via* tracking most frequently accessed directories and files when a particular application is employed. (*See* Abstract; col. 1, ln. 66 – col. 2, ln. 8). Beyda *et al.* is silent in regards to inferring and/or determining expected navigation costs for directory operations associated with potential target directories and that the expected navigation cost is based on a probabilistic and/or utility analysis. Thus, Beyda *et al.* fails to teach or suggest such claimed aspects.

Moreover, Beyda *et al.* does not teach or suggest that a subset of potential target directories is determined by selecting target directories, based in part on the expected navigation cost, in order to minimize a cost of traversing directories as recited in independent claim 1 (and similarly independent claim 27). Rather, Beyda *et al.* lists directories or files in order of most likely use based on frequency tracking from a particular application. (*See* col. 2, ll. 3-6). Hence, Beyda *et al.* fails to teach or suggest such claimed aspects.

Furthermore, Beyda *et al.* does not teach or suggest ***assigning probabilities and utilities*** to a plurality of potential target nodes or ***determining an expected utility from the probabilities and utilities*** associated with the plurality of target nodes as recited in independent claim 13 (and similarly independent claim 26). Probabilities and utilities are assigned to each node and expected utilities are determined based on the probabilities and utilities. The Office Action dated March 15, 2005 contends that Beyda *et al.* discloses such aspects at col. 5, ln. 12 – col. 6, ln. 22 and col. 2, ll. 9-18. (*See* pg. 5). Applicants'

representative respectfully disagrees with such contentions. Beyda *et al.*, on the contrary, relates to determining frequency of access. A user is able to adjust certain parameters of the adaptive file directory scheme *via* the time base interface, the duration interface, the file type interface, and the weighting interface. (*See* col. 5, ln. 12 – col. 6, ln. 22). However, these parameters relate to the frequency of use and do not teach or suggest ***assigning probabilities and utilities to a plurality of potential target nodes*** and ***determining an expected utility from the probabilities and utilities*** as recited in independent claims 13 and 26. Additionally, as noted in the Office Action dated March 15, 2005 at page 6, Beyda *et al.* does not teach or suggest that the utilities represent costs associated with navigating from a recommended node to an actual target node as recited in independent claim 13.

Beyda *et al.* also fails to teach or suggest ***displaying a candidate list of likely nodes*** as recited in independent claims 13 and 26 and that the candidate list comprises a subset of the potential target nodes as recited in independent claim 26. The candidate list provides a reduced subset from the set of all possible directories in which the user must peruse and traverse during directory operations. The Office Action asserts that such aspects are disclosed by Beyda *et al.* at col. 8, ll. 14-16 and col. 1, ln. 66 – col. 2, ln. 8. (*See* Office Action dated March 15, 2005, pg. 6). Applicants' representative respectfully disagrees with such contentions. Beyda *et al.* does not provide a reduced subset of all possible directories. Rather, Beyda *et al.* discloses that the user is provided with a list of directories or files in order of most likely use. (*See* col. 2, ll. 3-6). Beyda *et al.* is silent with regards to providing a user with a reduced subset of all possible directories; thus, Beyda *et al.* does not teach or suggest ***displaying a candidate list of likely nodes*** as recited in the subject claims.

Basso *et al.* fails to make up for the aforementioned deficiencies of Beyda *et al. vis a vis* the subject claims. More particularly, Basso *et al.* does not teach or suggest a first component that infers and/or determines ***expected navigation costs for directory operations associated with potential target directories***, the expected navigation cost is based on a probabilistic and/or utility analysis as recited in independent claim 1 (and similarly independent claim 27). The Office Action contends that Basso *et al.* discloses such claimed aspects at col. 1, ll. 22-28; col. 2, ll. 44-56; and col. 5, ll. 62-66. (*See* Office

Action dated March 15, 2005). Applicants' representative respectfully disagrees with such contentions. Basso *et al.* relates to determining an optimal path for routing a communication in a communication network between a source node and at least one destination node. (*See* Abstract). The determination can be based upon evaluating bandwidth, additive cost and hop count associated with the paths. (*See* col. 2, ll. 44-56). The additive cost is based on a given cost being associated with each link between a source and destination node in a network. (*See* col. 1, ll. 22-28). Thus, Basso *et al.* is related to costs associated with various paths within a network. The network traversing costs of Basso *et al.* differ from expected navigation costs for ***directory operations associated with potential target directories*** as recited in the subject claims. Therefore, Basso *et al.* fails to teach or suggest such claimed aspects.

Furthermore, Basso *et al.* does not teach or suggest that a ***subset of potential target directories*** is determined by selecting target directories, based in part on the expected navigation cost, in order to ***minimize a cost of traversing directories*** as recited in independent claim 1 (and similarly independent claim 27). As noted *supra*, Basso *et al.* is related to evaluating paths for routing a connection through a network. (*See* col. 2, ll. 38-43). Basso *et al.* discloses a routing table that comprises entries for each node of the network. (*See* col. 6, ll. 46-60). However, Basso *et al.* is not related to evaluating potential target directories; thus, Basso *et al.* is silent regarding determining a subset of ***potential target directories***. Additionally, since Basso *et al.* is related to traversing a network and *not* a hierarchy of directories, Basso *et al.* does not teach or suggest ***minimizing a cost of traversing directories*** as claimed. Thus, Basso *et al.* fails to teach or suggest such aspects as claimed.

Moreover, Basso *et al.* does not teach or suggest that the utilities represent costs associated with navigating from a ***recommended node*** to an ***actual target node*** as recited in independent claim 13. The Office Action asserts such aspects are disclosed by Basso *et al.* at col. 1, ll. 22-28; col. 2, ll. 44-56; col. 5, ll. 62-66; col. 7, ll. 7-10; and col. 6, ll. 46-60. Applicants' representative respectfully disagrees with such assertions. More particularly, Basso *et al.* relates to determining additive costs based on link costs of the component links of a path. (*See* Abstract). Basso *et al.* is determining the cost associated with a network path from a source node to a destination node. This cost differs from the

costs associated with navigating from a recommended node to an actual target node. Therefore, Basso *et al.* does not teach or suggest that the costs are associated with ***navigating from a recommended node to an actual target node*** as claimed. Basso *et al.* also does not teach or suggest ***assigning probabilities and utilities to a plurality of potential target nodes, determining an expected utility from the probabilities and utilities***, and ***displaying a candidate list of likely nodes*** as recited in independent claims 13 and 26.

In view of at least the foregoing, it is readily apparent that Beyda *et al.* and Basso *et al.*, alone or in combination, do not teach or suggest the subject invention as recited in independent claims 1, 13, 26, and 27 (and claims 3-10, 14-22, 25, and 29-34 which respectively depend there from). This rejection should be withdrawn.

## II. Rejection of Claims 11, 12, 23, and 24 Under 35 U.S.C. §103(a)

Claims 11, 12, 23, and 24 stand rejected under 35 U.S.C. §103(a) as being as being unpatentable over Beyda *et al.* (U.S. 6,148,294) in view of Basso *et al.* (U.S. 6,370,119 B1), and further in view of Candan *et al.* (U.S. 6,549,896). It is respectfully submitted that this rejection should be withdrawn for at least the following reasons. Beyda *et al.*, Basso *et al.*, and Candan *et al.*, individually or in combination, do not teach or suggest each and every element set forth in the subject claims. In particular, Candan *et al.* does not make up for the aforementioned deficiencies of Beyda *et al.* and Basso *et al.* with respect to independent claims 1 and 13 (which claims 11, 12, 23, and 24 depend from). Therefore, the subject invention as recited in claims 11, 12, 23, and 24 is not obvious over the combination of Beyda *et al.*, Basso *et al.*, and Candan *et al.* Thus, it is respectfully submitted that this rejection be withdrawn.

## CONCLUSION

The present application is believed to be in condition for allowance in view of the above comments and amendments. A prompt action to such end is earnestly solicited.

In the event any fees are due in connection with this document, the Commissioner is authorized to charge those fees to Deposit Account No. 50-1063.

Should the Examiner believe a telephone interview would be helpful to expedite favorable prosecution, the Examiner is invited to contact applicants' undersigned representative at the telephone number below.

Respectfully submitted,

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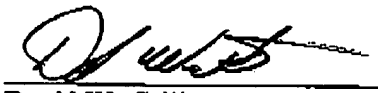

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